

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$19,980.00 IN
U.S. CURRENCY,

15 APPROXIMATELY \$15,000.00 IN
16 U.S. CURRENCY, AND

17 APPROXIMATELY \$4,335.00 IN
18 U.S. CURRENCY,

19 Defendant.

2:21-MC-00213-MCE-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Jason
21 Brewer ("claimant"), by and through their respective counsel, as follows:

22 1. On or about June 4, 2021, claimant filed a claim in the administrative forfeiture proceeding
23 with the United States Postal Inspection Service ("USPIS") with respect to the Approximately \$19,980.00
24 in U.S. Currency, Approximately \$15,000.00 in U.S. Currency and Approximately \$4,335.00 in U.S.
25 Currency (hereafter "defendant currency"), which were seized on March 17, 2021.

26 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
27 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
28 ///

1 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
2 to the defendant currency as required by law in the administrative forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
5 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
6 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
7 That deadline was September 2, 2021.

8 4. By Stipulation and Order filed September 7, 2021, the parties stipulated to extend to October
9 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 5. By Stipulation and Order filed October 7, 2021, the parties stipulated to extend to November
13 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

16 6. By Stipulation and Order filed November 8, 2021, the parties stipulated to extend to
17 December 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
19 to forfeiture.

20 7. By Stipulation and Order filed December 3, 2021, the parties stipulated to extend to January
21 31, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
22 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
23 forfeiture.

24 8. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to April 1,
25 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
26 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
27 forfeiture.

28 ///

1 9. By Stipulation and Order filed April 1, 2022, the parties stipulated to extend to May 2, 2022,
2 the time in which the United States is required to file a civil complaint for forfeiture against the defendant
3 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

4 10. By Stipulation and Order filed May 3, 2022, the parties stipulated to extend to June 1, 2022,
5 the time in which the United States is required to file a civil complaint for forfeiture against the defendant
6 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

7 11. By Stipulation and Order filed June 1, 2022, the parties stipulated to extend to July 1, 2022,
8 the time in which the United States is required to file a civil complaint for forfeiture against the defendant
9 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

10 12. By Stipulation and Order filed July 11, 2022, the parties stipulated to extend to August 1,
11 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
13 forfeiture.

14 13. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to August
15 31, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
17 forfeiture.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 14. Accordingly, the parties agree that the deadline by which the United States shall be required
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
3 the defendant currency is subject to forfeiture shall be extended to August 31, 2022.

4
5 Dated: 07/29/22

PHILLIP A. TALBERT
United States Attorney


6
7 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

8
9 Dated: 07/29/22

10 /s/ Valery Nechay
VALERY NECHAY
Attorney for potential claimant
Jason Brewer
(Signature authorized by phone)

11
12
13
14
15 **IT IS SO ORDERED.**

16 Dated: August 5, 2022

17
18 
MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE